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November 15, 2022

## **VIA ELECTRONIC CASE FILING**

Hon. Vincent L. Briccetti The Hon. Charles L. Brieant Jr. United States Courthouse 300 Quarropas St. White Plains, NY 10601-4150

Re: Cohen v. Westlake Services, Inc. et al, 7:22-cv-07182 VB

Dear Judge Briccetti:

Pursuant to Local Rule 7.1(d) and Your Honor's individual rules of practice, the Defendant's in this matter hereby request a 44-day adjournment of the deadline for filing a responsive pleading in this matter. There is good cause to grant this request.

Although initially filed on August 23, 2022, the Complaint in this matter was not served on Defendants until November 2, 2022. As a result, the current due date for a responsive pleading is November 23, 2022. Defendants have recently retained the undersigned to represent them in this matter. Given the number of Defendants and the allegations of the Complaint, additional time is needed to investigate the matter, decide upon a course of action, and file the appropriate pleading. Accordingly, the Defendants are requesting until Friday, January 6, 2023, to file a responsive pleading in this matter.

The undersigned has communicated with Plaintiff's counsel, Jimmy Miguel Santos, about the instant request. Attorney Santos has graciously consented to this request.

In view of the foregoing, the undersigned respectfully requests that the Court extend the deadline to file a responsive pleading 44-days, from November 23, 2022 until January 6, 2023.

Respectfully submitted.

Craig T. Dickinson

CTD/hs